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Attorneys for Defendant  
THE CHILDREN'S PLACE RETAIL STORES, INC.

*(See Signature Page for complete list of parties represented.)*

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
OAKLAND DIVISION

GALINA SEEBROOK, individually and on  
behalf of all others similarly situated,

Plaintiffs,

v.

THE CHILDREN'S PLACE RETAIL  
STORES, INC., a Delaware corporation,

Defendant.

Consolidated Case No. 11-cv-00837-CW

**STIPULATION AND [PROPOSED] ORDER TO  
EXTEND DEADLINES RE CLASS  
CERTIFICATION**

Judge: Hon. Claudia Wilken  
Place: Courtroom 2, 4th Floor

Trial Dates: Not Yet Set

MARIA ISABEL BELTRAN, an individual,  
on behalf herself and of all others similarly  
situated,

Plaintiff,

v.

THE CHILDREN'S PLACE RETAIL  
STORES, INC., a Delaware Corporation; and  
DOES 1 through 50, inclusive,

Defendants.

Case No. 11-cv-01664-CW

CONSOLIDATED CASE NO. 11-CV-00837-CW

NICOLLE DiSIMONE, individually, and on  
behalf of all others similarly situated,

Case No. 11-cv-02223-CW

Plaintiff,

v.

THE CHILDREN'S PLACE RETAIL  
STORES, INC., a Delaware corporation, and  
DOES 1 – 500,

Defendants.

KRISTEN HARTMAN, an individual, on  
behalf of herself and all others similarly  
situated,

Case No. 11-cv-02604-CW

Plaintiffs,

v.

THE CHILDREN'S PLACE RETAIL  
STORES, INC., a Delaware Corporation, and  
DOES 1 through 50, inclusive

Defendants.

Plaintiffs Galina Seebrook, Maria Isabel Beltran, Nicolle DiSimone, and Kristen Hartman and defendant The Children's Place Retail Stores, Inc. ("Children's Place"), by and through their respective counsel, jointly submit the following stipulation to extend the deadlines regarding class certification.

#### RECITALS

**WHEREAS**, the parties have scheduled a mediation before Judge Edward A. Infante (Ret.) on February 27, 2010; and

**WHEREAS**, the parties believe that an extension of the deadlines regarding class certification is warranted for judicial efficiency and to allow the parties to focus their efforts and resources on settlement efforts;

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**STIPULATION**

**NOW, THEREFORE, IT IS STIPULATED AND AGREED**, by the parties, through their respective counsel of record, that the dates relating to class certification shall be extended as follows:

- Parties to exchange class expert disclosures and reports for affirmative experts on or before April 6, 2012.
- Parties to exchange class expert disclosures and reports for rebuttal experts on or before May 4, 2012.
- Plaintiffs shall file any motion for class certification on or before June 7, 2012.
- Children's Place shall file any opposition to class certification on or before July 12, 2012.
- Plaintiffs shall file any reply brief in support of class certification on or before July 26, 2012.
- Hearing on class certification shall be held on August 9, 2012 at 2:00 PM or at the Court's convenience.

**IT IS SO STIPULATED.**

Dated: December 1, 2011

COOLEY LLP  
MICHELLE C. DOOLIN (179445)  
MAZDA K. ANTIA (214963)  
JENNIFER M. FRENCH (265422)

/s/ Jennifer M. French

Jennifer M. French

Attorneys for Defendant  
THE CHILDREN'S PLACE RETAIL STORES, INC.

1 Dated: December 1, 2011

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5 /s/ Chad A. Saunders

6 Chad A. Saunders

7 Attorneys for Plaintiff  
8 GALINA SEEBROOK

9 Dated: December 1, 2011

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12 /s/ James R. Patterson

13 James R. Patterson

14 Attorneys for Plaintiff  
15 MARIA ISABEL BELTRAN

16 Dated: December 1, 2011

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21 AVIVA N. ROLLER (245415)

22 /s/ Christopher P. Ridout

23 Christopher P. Ridout

24 Attorneys for Plaintiff  
25 NICOLLE DiSIMONE  
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1 Dated: December 1, 2011

STONEBARGER LAW, APC  
GENE J. STONEBARGER (209461)  
RICHARD D. LAMBERT (251148)

2  
3  
4 /s/ Gene J. Stonebarger

Gene J. Stonebarger

5  
6 Attorneys for Plaintiff  
KRISTEN HARTMAN

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8  
9 **FILER'S ATTESTATION**

10 *Filer's Attestation: Pursuant to General Order No. 45, Section X(B) regarding signatures,*  
11 *Jennifer M. French hereby attests that concurrence in the filing of this document has been*  
12 *obtained.*

**[PROPOSED] ORDER**

Based on the foregoing, and good cause appearing, **IT IS HEREBY ORDERED** that the dates relating to class certification shall be extended as follows:

- Parties to exchange class expert disclosures and reports for affirmative experts on or before April 6, 2012.
- Parties to exchange class expert disclosures and reports for rebuttal experts on or before May 4, 2012.
- Plaintiffs shall file any motion for class certification on or before June 7, 2012.
- Children's Place shall file any opposition to class certification on or before July 12, 2012.
- Plaintiffs shall file any reply brief in support of class certification on or before July 26, 2012.
- Hearing on class certification shall be held on August 9, 2012 at 2:00 PM.

**IT IS SO ORDERED.** A further Case management conference will also be held on August 9, 2012.

Dated: 12/2/2011

  
\_\_\_\_\_  
THE HONORABLE CLAUDIA WILKEN  
UNITED STATES DISTRICT JUDGE